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BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Mailing Online Service

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: BETH B. ROTHSCHILD
(OCA/USPS-T4-34-35)
(August 13, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories

OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,

Gail Willette

Acting Director

Office of the Consumer Advocate

Shelley S. Dreifuss

Attorney

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OCA/USPS-T4-34. Please refer to USPS-LR-2/MC98-1, pages 30-37.

- a. USPS-LR-2, page 30 indicates that "[t]he weighted survey results for questions 4, 7, 8, 11, 14, and 15 provide raw estimates of NetPost volume under each price and product configuration scenario." Please provide a copy of the survey summary results for each of the 6 questions referenced.
- b. Please refer to Table 15, page 34. For each year and for each cell within Table 15, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.
- c. Please refer to Table 16, page 35. For each year and for each cell within Table 16, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.
- d. Please refer to Table 17, page 36. For each year and for each cell within Table 17, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.
- e. Please refer to Table 18, page 37. For each year and for each cell within Table 18, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.

OCA/USPS-T4-35. Please refer to Table 7, page 22. For each cell within Table 7, show the derivation of all calculated numbers. Give citations to page, column and row (if applicable) to source documents for all figures. Provide copies of all source documents not previously filed in this docket.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Shelley S. Dreifuss

Attorney

Washington, D.C. 20268-0001 August 13, 1998